

Friends at CT DEEP, CT DOT, and members of the GC3,

I noticed that in the [December 11th Governor's Council on Climate Change \(GC3\) slides](#), that there is still a plan for increasing motor vehicle miles traveled (VMT) until year 2030. Including that as part of the plan / assumptions in how the state responds to the climate crisis is more than troubling and deserves to be revisited. This is my public comment on the Dec 11th, 2019 meeting document.

First, 38% of the state's greenhouse gas emissions are from the transportation sector, the largest contributing sector by far. Increasing VMT would offset much of the reductions in "on-road" emissions due to the adoption of higher mpg and electric vehicles. Beyond the on-road emissions, the global (not emitted in CT) would rise, as most of an electric vehicle's significant emissions occur due to raw material mining and manufacturing. Moving more residents in low-occupancy personal vehicles is inherently greenhouse gas emissions intensive.

Subsidies and supports for electric vehicle purchases are rather inefficient methods for reducing global (we need to consider the full life cycle emissions) greenhouse gas emissions. On top of that inefficiency, those type of [incentives are inequitable](#) going largely to high income families that would typically be purchasing an increased efficiency vehicle even without a subsidy. Electric vehicles have additional systemic effects in that they lower the daily per-mile cost of low-occupancy driving commutes, which could support continued per capita VMT increase and (emissions heavy) rural sprawling housing development.

Second, [Connecticut has experienced five \(going on six\) years of continuous population decline](#). Assumptions in CT DOT and metro region transportation models based on outdated predictions of several decades of constant, slow population growth are flawed. This is not the first time this modeling and planning disconnect has been highlighted. While the [CRCOG Long Range Transportation Plan](#) was available for public review in 2019, the incorrect population growth assumptions and resultant 13.9% increase in VMT was questioned by a public comment from the Transport Hartford Academy. The tragedy is that long range transportation plans that continue to aim for increasing VMT are only updated every five years or so. With only 10 years to make sizable reductions in transportation related emissions, these plans at the regional and state level are critically important. We are at zero hour for responding to this crisis at the state and national level. Status quo approaches to transportation planning and modeling are not going to solve the problem, and in many ways prop up the failed model of car-centric, emissions-heavy sprawl and interstate / state route expansion.

A more sustainable and economically / culturally vibrant approach to mobility and transportation in our state would be a combination of improved bus/rail transit, more walkable/bike-able cities and town centers, and a focus on transit-oriented development (with strict limitations or fees on rural development). The GC3 should include a clear goal to reduce overall VMT by at least 10% by year 2030 with a corresponding goal to maintain or improve overall mobility and access with sustainable transportation investments and transit-oriented development. There are near term bus transit improvement plans in both [Hartford](#) and [New Haven](#) metro regions ready to be implemented. We're also seeing a move toward transit-oriented development along the CTfastrak and Hartford Line commuter rail stations that will continue to replace many daily car commutes with those on transit and in the walkable centers around the stations.

This [Oct 2019 statewide survey of Connecticut residents](#) (pdf attached) showed strong support for a moratorium on interstate and state route widening. There was also strong support for a moratorium (or

steep fee) for rural and green space development. Those looking forward toward a sustainable transportation future in CT most highly ranked (1) improvements to the existing transit system, (2) complete streets investments that provided safe walking and biking alternatives to driving, and (3) expansions to rail and bus transit to those not yet served. That Connecticut-focused survey is buttressed by a [randomized survey of Northeast and Mid-Atlantic state voters](#), including 320 CT voters.

Thanks for your important work on this issue. My best wishes for progress and positive impact on our state's sustainability, quality of life, and equity for residents in 2020. Happy New Year!

Tony Cherolis
Transport Hartford Coordinator
Center for Latino Progress
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December 10, 2019

Dear Governor Lamont,

As Chair of the Connecticut Urban Forest Council, I would like to take a moment to offer suggestions in improving our chances of combating climate change, as trees and the climate crisis go hand in hand. A critical component to ensuring that our urban forest stay healthy and resilient during this climate crisis is to quantify the importance and value of the presence of trees in our state. Below are several suggestions that would greatly improve our states ability to respond to the critical issues that are now present:

1. Funding for tree planting throughout our major cities. In terms of planting in the capital city, double the recommended planting number for the next five years due to the vast amount of tree mortality from the drought of 2016, invasive insects, and disease.
2. Develop a regional tree maintenance program to assist towns with managing their urban forest and reducing liability. Possibly use this program as a training and apprenticeship opportunity for people who are interested in seeking a career in arboriculture.
3. Support for urban wood utilization programs to increase carbon sequestration. For example: The Keney Park Sustainability Project – Hartford, CT.
4. Utilization of green infrastructure and reclamation of storm water for growing urban trees.
5. Educational programs for youth to learn the value of trees and how they mitigate impacts of climate change and benefit human health.
6. Adjustments in the pruning practices of our energy utility companies, through PURA to be more arboriculturally sound.
7. Recognition of scientifically-based means by which the ecosystem service benefits of trees can be quantified, including such tools and techniques as those included in the iTree Suite of software tools developed by the US Forest Service. Such quantifications include carbon sequestration and storage, energy use reductions and air and water pollution improvements.

I thank you for your time and consideration. Our council is always available for guidance and assistance, should you need it.

Sincerely,

Heather S. Dionne
City Forester, City of Hartford
B.S. Urban and Community Forestry
ISA Certified Arborist: NE-6331A
CT Certified Arborist: S-5529

From: Mary Stevens <mk-stevens@live.com>
Sent: Wednesday, January 8, 2020 9:41 AM
To: DEEP ClimateChange
Subject: Dec 11th, 2019 - GC3 Meeting Public Comment

Follow Up Flag: Follow up
Flag Status: Flagged

To Whom it May Concern on the GC3,

Thank you for working on this important project.

(1) There needs to be a 10% or 20% Vehicle Miles Traveled (VMT) reduction goal by year 2030. The current assumption and plan for increasing VMT until 2030 puts the overall goal at risk and would require increased per capita driving since CT has been experiencing flat / falling population. (2) The building sector plan should propose a state wide moratorium or steep fee on rural sprawling development of farms, green spaces, and forests coupled with supports for transit-oriented, town center, and infill development. A more sustainable land use policy is critical to meeting and exceeding the greenhouse gas reduction goals by helping to reduce vehicle miles traveled.

Thanks again for your time and the opportunity to make this comment.

Mary Stevens
66-1 High Street
Guilford, CT 06437
206-769-9218
mk-stevens@live.com

From: Jonathan Hawkins <jonathan.hawkins@yale.edu>
Sent: Tuesday, January 7, 2020 10:07 AM
To: DEEP ClimateChange
Subject: Dec 11th, 2019 - GC3 Meeting Public Comment

Follow Up Flag: Follow up
Flag Status: Flagged

To Whom it May Concern on the GC3,

Thank you for working on this important project.

(1) Tolling on CT interstates must be included in the transportation plan. Tolling would bring CT into line with neighboring states. Tolls would have the direct effect of reducing car-usage by encouraging substitution to the CT rail system and improving efficiency through reduced congestion. It would also have the indirect effect of raising much needed revenue to fund further improvements to CT's transportation infrastructure.

(2) There needs to be a 10% or 20% Vehicle Miles Traveled (VMT) reduction goal by year 2030. The current assumption and plan for increasing VMT until 2030 puts the overall goal at risk and would require increased per capita driving since CT has been experiencing flat / falling population.

(3) The building sector plan should propose a statewide moratorium or steep fee on rural sprawling development of farms, green spaces, and forests coupled with supports for transit-oriented, town center, and infill development. A more sustainable land use policy is critical to meeting and exceeding the greenhouse gas reduction goals by helping to reduce vehicle miles traveled.

Thanks again for your time and the opportunity to make this comment.

Jonathan Hawkins
New Haven, CT 06511

From: Royal <royal5@cox.net>
Sent: Monday, January 6, 2020 9:01 PM
To: DEEP ClimateChange
Subject: Dec 11th, 2019 - GC3 Meeting Public Comment

Follow Up Flag: Follow up
Flag Status: Flagged

To Whom it May Concern on the GC3,

Thank you for working on this important project.

The building sector plan should propose a state wide moratorium or steep fee on rural sprawling development of farms, green spaces, and forests coupled with supports for transit-oriented, town center, and infill development. A more sustainable land use policy is critical to meeting and exceeding the greenhouse gas reduction goals by helping to reduce vehicle miles traveled.

Thanks again for your time and the opportunity to make this comment.

Royal Graves

Wethersfield

From: paulpver@aol.com
Sent: Monday, January 6, 2020 8:12 PM
To: DEEP ClimateChange
Subject: Dec 11th, 2019 - GC3 Meeting Public Comment

Follow Up Flag: Follow up
Flag Status: Flagged

To Whom it May Concern on the GC3, Thank you for working on this important project. (1) There needs to be a 10% or 20% Vehicle Miles Traveled (VMT) reduction goal by year 2030. The current assumption and plan for increasing VMT until 2030 puts the overall goal at risk and would require increased per capita driving since CT has been experiencing flat / falling population. (2) The building sector plan should propose a state wide moratorium or steep fee on rural sprawling development of farms, green spaces, and forests coupled with supports for transit-oriented, town center, and infill development. A more sustainable land use policy is critical to meeting and exceeding the greenhouse gas reduction goals by helping to reduce vehicle miles traveled. Thanks again for your time and the opportunity to make this comment. [your name] [your city and contact information]

From: Chris D'Antonio <cdantonio@live.com>
Sent: Monday, January 6, 2020 5:56 PM
To: DEEP ClimateChange
Subject: Dec 11th, 2019 - GC3 Meeting Public Comment

Follow Up Flag: Follow up
Flag Status: Flagged

To Whom it May Concern on the GC3,

Thank you for working on this important project.

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Thanks again for your time and the opportunity to make this comment.

Chris D'Antonio
Enfield, CT

From: SUE VANDERZEE <bvanderzee1234@comcast.net>
Sent: Monday, January 6, 2020 5:25 PM
To: DEEP ClimateChange
Subject: Dec 11th, 2019 - GC3 Meeting Public Comment

Follow Up Flag: Follow up
Flag Status: Flagged

To Whom it May Concern on the GC3, Thank you for working on this important project. (1) There needs to be a 10% or 20% Vehicle Miles Traveled (VMT) reduction goal by year 2030. The current assumption and plan for increasing VMT until 2030 puts the overall goal at risk and would require increased per capita driving since CT has been experiencing flat / falling population. (2) The building sector plan should propose a state wide moratorium or steep fee on rural sprawling development of farms, green spaces, and forests coupled with supports for transit-oriented, town center, and infill development. A more sustainable land use policy is critical to meeting and exceeding the greenhouse gas reduction goals by helping to reduce vehicle miles traveled. Thanks again for your time and the opportunity to make this comment.

Sue VanDerzee, Cromwell

From: Jennifer Godzeno <jbs006@gmail.com>
Sent: Monday, January 6, 2020 4:20 PM
To: DEEP ClimateChange
Subject: Dec 11th, 2019 - GC3 Meeting Public Comment

Follow Up Flag: Follow up
Flag Status: Flagged

To Whom it May Concern on the GC3,

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Thanks again for your time and the opportunity to make this comment.

Jennifer Godzeno
Stamford, CT

From: Alexander Rodriguez <alex@ctlcv.org>
Sent: Monday, January 6, 2020 3:45 PM
To: DEEP ClimateChange
Subject: Dec 11th, 2019 - GC3 Meeting Public Comment

Follow Up Flag: Follow up
Flag Status: Flagged

To Whom it May Concern on the GC3,

Thank you for working on this important project.

(1) There needs to be a 10% or 20% Vehicle Miles Traveled (VMT) reduction goal by year 2030. The current assumption and plan for increasing VMT until 2030 puts the overall goal at risk and would require increased per capita driving since CT has been experiencing flat / falling population. (2) The building sector plan should propose a state wide moratorium or steep fee on rural sprawling development of farms, green spaces, and forests coupled with supports for transit-oriented, town center, and infill development. A more sustainable land use policy is critical to meeting and exceeding the greenhouse gas reduction goals by helping to reduce vehicle miles traveled.

Thanks again for your time and the opportunity to make this comment.

Alexander Rodriguez
West Hartford
860-840-6004
alex@ctlcv.org

Sent from my iPhone

From: [Diane Hoffman](#)
To: [DEEP ClimateChange](#)
Subject: Testimony for DEEP meeting 12/11/19 for the Governor's Council on Climate Change.
Date: Tuesday, December 10, 2019 2:37:39 PM
Attachments: [CT Mirror article RE strong winds Halloween night.docx](#)
[United Illuminating's Targeted Risk Management Plan.docx](#)
[HB5308 Testimony.docx](#)
[Letter to Lamont10-14-2019revA.doc](#)

2/10/19

Dear DEEP Officials:

Thank you for this opportunity to tell the Governor what we care about regarding climate and what we believe should be a part of the Governor's Council on Climate Change.

I am here to speak on behalf of Hamden Alliance for Trees (HAT).

HAT recognizes that Trees are a precious natural resource and are fundamental to a healthy natural ecosystem. We believe that trees are our best natural ally in the fight against climate change which is why nations across the globe are planting billions of trees in an effort to reduce their carbon footprint.

On Sept 3rd Governor Lamont released Executive Order #3 calling for “strengthening Connecticut’s Efforts to Mitigate Climate Change.” Gov. Lamont acknowledged that “Climate change is an urgent, existential threat that must be tackled immediately” and he made a commitment to “see to it that Connecticut remains a national leader on climate action” HAT strongly supports the governor’s call for action.

We understand that historically, trees have had a very minor role in the Governor’s Council on Climate Change. A few years ago there was a webinar hosted by the Office of Climate Change as part of the GC3 process, concerning the role of reforestation as a means of carbon sequestration. We believe that much has been learned over the past several years on the important role that trees play in carbon sequestration. We believe the Council should now include trees as an important factor to consider when doing their analysis and recommending policy.

There are several actions we would like to see the Governor endorse and actively promote and require as necessary, to significantly impact how trees are protected, nurtured and planted in Connecticut to increase carbon sequestration.

1. We believe that it is imperative that the Governor understands the critical importance of our Trees throughout Connecticut and that their importance be reflected in his response to weather related emergencies such as the violent winds Ct experienced this past Halloween night. The Governor should require immediate action by DOT and the electric utility companies to focus on removing dead and pest infested trees and leave healthy trees standing. Replacing the removed trees with young healthy trees should be required to naturally fill in the area, as older trees die. (Please see the attached copy of a HAT opinion piece that was printed in the CT Mirror on Dec. 3rd which speaks to these points.)
2. The public utilities have an enormous impact on the trees in the Utility Protection Zone in all of our municipalities. The Governor should empower and require the Public Utility Regulatory Authority (PURA) to give equal or greater importance to the environmental impact of their decisions when considering the performance of the utilities especially as it pertains to their vegetation management and the protection of trees in the Utility Protection Zone. PURA should be required to take all necessary measures to ensure that the electric utility companies comply with all of the mandated vegetation management laws. There should be a significant financial cost levied against the utility for every violation where the law is not followed.

Of current great concern, Hamden Alliance for Trees is hearing reports that United Illuminating is apparently attempting to abuse an emergency exception in the state statutes and use it as their regular vegetation management process.

C.G.S.16-234 allows an exception to the permit and notice requirements in situations where part of a tree is in contact with a live wire or is burning. It reads:

(e) No utility shall be required to obtain a permit pursuant to subsection (f) of section 23-65 or provide notice under subsection (c) of this section to prune or remove a tree, as necessary, if any part of a tree is in direct contact with an energized electrical conductor or has visible signs of burning. Nothing in this subsection shall be construed to require a utility to prune or remove a tree.

UI is using what it refers to as Targeted Risk Management (TRM), and is apparently claiming that it can remove or prune trees along streets without following the permit and notice process, even where there is no direct contact, because the tree limbs are close to the wires.

TRM circumvents the local review process intended by the legislature in C.G.S.16-234. As a result, tree wardens and local property owners are being denied their legal right to a voice about what happens to our street trees – trees that are important to the character of our neighborhoods, increase property values and protect our environment. TRM further threatens the resiliency of our towns and will be devastating to our trees and to the residents of Connecticut. PURA must not allow UI to use this strategy. (Please see the attached explanation of TRM, which has a link to the law, for more information.)

3. Regarding trees maintained by the DOT, especially trees along the highways: the Governor should instruct the DOT to follow all best practices and only remove trees that meet the definition of a hazardous tree as defined in P.A. 14-151. In addition, all pruning should be as minimal as possible and performed by a licensed arborist so that the tree scape is not weakened.

(Please see the viewpoint published in the CT Mirror May 31, 2019 “The DOT must bring more love to trees.” Also, attached is HAT testimony submitted to the Legislative Environment Committee on the importance of trees along our highways. In addition, see page 4 of the link provided in the attachment referred to in #2 above for a definitionof hazardous tree)

4. Lastly, we need to begin the process to Underground the Electrical Distribution System in Connecticut. HAT member, Henry Dynia, has researched this extensively and writes “We need a “Governor’s Task Force on Undergrounding” that is immune to sabotage by the utilities, who need to remember that they are in our public space, and will have to comply with the public’s requirements. PURA’s regulatory framework will have to be modified to enable this, since getting this done will require precisely defined roles for all stakeholders and players: The Legislature, PURA, Regional Councils of Government, local governments, town engineers, planners, and all the utilities that have their services on the poles that will be removed. Our public space will then look like that of a permanent, mature settlement, instead of a frontier town.” (Please see the attached letter sent to the Governor 10/21/19.)

Thank you for the opportunity to share our thoughts and concerns with you.

As HAT stated in our opinion piece in the Ct Mirror: To Lead on Climate-Connecticut must protect our trees. For our own sake and our children's future, we must demand an end to the now radically dangerous acceptance of **“Business as Usual.”**

We are counting on the Governor to become the knowledgeable, articulate, and persistent climate advocate we so urgently need and we believe inclusion of these 4 action areas, listed above, can make a significant difference.

We would appreciate a response to this letter.

Thank you very much for your attention and consideration.

Sincerely,

Diane Hoffman for

Hamden Alliance for trees.

CT Mirror opinion piece printed Dec. 3, 2019 RE: Gov. response on Nov. 1st to strong winds Halloween night

To lead on climate, CT must protect our trees!

Disappointment sprang anew when Gov Lamont commented on Nov 1st "I know my phone lights up every time DOT is trimming those trees along the highways; every time Eversource is cutting back on trees along the power wires. At least I think you now understand why they do it, why it's important, to prevent issues like this going forward,"

His comment fed the fear of trees that seems to be widespread. It played directly into the hands of the utility companies and the state DOT that want to remove trees wherever possible, regardless of their health.

This was a missed opportunity to remind the public that we are in a climate crisis. He could have advised the public of his newly released Executive Order #3 calling for "strengthening Connecticut's Efforts to Mitigate Climate Change." It was an opportunity for him to re-state his belief that "Climate change is an urgent, existential threat that must be tackled immediately and under the leadership of this administration I am going to see to it that Connecticut remains a national leader on climate action."

It was a missed opportunity to call upon the public to embrace a broad new strategy that includes harnessing and using the power of our trees to help us fight the effects of climate change, to make our communities more resilient and to show his understanding of the important role trees play in fighting climate change.

It was a chance to confirm that dead and diseased trees must be removed and healthy trees must be retained, with minimal trimming as needed, as every healthy tree is an asset that provides essential benefits to the citizens of CT every day.

It was an opportunity to explain to the people of CT that trees are our best natural ally in the fight against climate change, which is why nations across the globe are planting billions of trees in an effort to reduce their carbon footprint. In fact, the more trees we remove from along our highways and in our neighborhoods, the more extreme the weather is likely to become and the more severe the impact will be.

We have good reason to worry about the fate of our tree population. Connecticut has lost thousands of trees over the past couple of years from pest infestations, severe weather, development, and the actions of private property owners and utility companies. In 2016, statewide, 11,043 trees were removed by the utilities of which 703, (6.4%) were classified as hazardous trees. The rest, 10,340 trees, were NOT HAZARDOUS and should NOT have been removed!

The extreme weather we are now experiencing is having a catastrophic impact on our state, and we cannot ignore the massive economic, environmental, and human costs. The 2019 Intergovernmental Panel on Climate Change makes it abundantly clear that the climate crisis, which is exacerbating this weather, threatens the safety of all life on earth as we know it.

The CT DOT and the utility companies must now be required to comply with the Governor's new Executive Order and reflect its intent in all future tree work. This Executive Order establishes a high standard for tree wardens, builds in accountability, and makes clear that utilities have legal, environmental, aesthetic and community obligations as they go about their work. This includes evaluating the health of each tree and obtaining tree permits and abutting property owner consent for any work they perform in the Utility Protection Zone (UPZ), unless there is an immediate danger creating an emergency.

Greater restraint in removing trees must become the rule, focusing on removing dead and hazardous trees and replanting to help offset the cost of their previous massive tree removal programs. Failure to do so will be a willful act of negligence by these agencies who claim that safety is a primary concern.

For our own sake and our children's future, we must demand an end to the now radically dangerous acceptance of "**Business as Usual**". We are counting on the Governor to become the knowledgeable, articulate, and persistent climate advocate we so urgently need.

Diane Hoffman

For Hamden Alliance for Trees

2/13/19

Dear Co-Chair, Rep. Mike Demicco,
Co-Chair, Sen. Christine Cohen
Ranking Member, Rep. Stephen Harding, and
Ranking Member, Sen. Craig Miner,

Hamden Alliance for Trees supports [HB 5308 AN ACT CONCERNING VEGETATION MANAGEMENT ALONG STATE HIGHWAYS BY THE DEPARTMENT OF TRANSPORTATION.](#)

We believe it is critically important that updated guidelines are established for the DOT that govern vegetation management along state highways in a more responsible and transparent manner and provide for accountability to the residents of Connecticut to ensure that our critical natural resources are being protected to help make our state more resilient in this age of increasing extreme weather as a result of climate change.

It is appropriate and responsible that the DOT be required to provide their vegetation management plans and their vegetation management budget to the joint standing committees of the General Assembly that are responsible for matters relating to the environment, transportation and finance so that transparency and accountability is possible. Not to require this is irresponsible.

It is appropriate and **essential** that DOT's vegetation plan be reviewed every year by DEEP and evaluated by certified arborists. An environmental impact statement should be completed before their work plans are implemented to ensure the plans are consistent with current environmental concerns as described in Section 1 of the Bill and as the concerns evolve. Without this regular review and analysis, we are risking the health of our basic infrastructure, our earth.

It is appropriate that the DOT post their guidelines on the internet website for all to see to ensure transparency and adherence to their plans.

The DOT cites safety as a main reason for removing trees along our highways. Their view of safety must be re-examined and expanded. The impact of extreme weather, which is the new normal, cannot be ignored given its massive economic, environmental and social cost. The more trees we remove from our environment, the more extreme this weather will become and the greater the cost. TREES are nature's way of sequestering carbon dioxide through their leaves, bark, and roots. Protecting healthy trees and planting trees is essential to reducing carbon dioxide in our atmosphere. Connecticut lost thousands of trees over the last 5 years from extreme weather events and actions by DOT and the electric utilities. We must re-evaluate our relationship with our trees and recognize their critical role on earth as our best natural ally in the fight against climate change.

DOT spends upwards of 2 million dollars a year on clear cutting. Removing trees must cease to be the default decision when evaluating safety issues. Rather,

removing trees must become the last option considered as it further weakens our basic ecosystem, the most basic safety factor there is! Also, more obviously, trees are major shields of sun glare which is a serious problem at various times of the year and mask the major distraction of cars traveling in the opposite direction. Trees also have a calming effect which helps to reduce anxiety, road rage and pressure when people are driving in heavy traffic.

In conclusion, planners, legislators and government department heads must stop seeing trees as a problem, an inconvenience, a threat.... and instead, understand that trees are tirelessly working on our behalf and are truly the life blood of our ecosystem.

HB5308 makes significant strides to correct the direction of the DOT towards a more environmentally sound governmental department working in the best interests of Connecticut residents and should be passed this year.

The clock is ticking.

Sincerely,
Diane Hoffman
Melinda Tuhus
Dick Hasbany
Susan Etkind
For Hamden Alliance for Trees
190 Wilmot Rd.
Hamden, CT 06514

Background on UI's targeted Risk Management plan

In 2016, Connecticut passed Section 16-234 of the Connecticut general statutes, which defines the vegetation management process utilities must follow, when pruning or removing trees around their power lines, within the public right-of-way and on public land. <https://www.cga.ct.gov/2014/ACT/pa/pdf/2014PA-00151-R00HB-05408-PA.pdf>

The law requires the utilities to evaluate each tree, get a tree permit from the tree warden, and notify the abutting property owner before doing any work. The property owner can agree, object or ask for modifications.

The statute allowed an exception to the permit and notice requirements in situations where part of a tree is in contact with a live wire or is burning. The exception clearly was only intended for emergencies.

UI is now apparently abusing this exception. Using its new policy, Targeted Risk Management (TRM), UI is apparently claiming that it can remove or prune trees along Hamden's streets without following the permit and notice process, even where there is no direct contact, because the tree limbs are close to the wires.

TRM circumvents the local review process intended by the legislature in 16-234. As a result, tree wardens and local property owners are being denied their legal right to a voice about what happens to our street trees – trees that are important to the character of our neighborhoods, increase property values and protect our environment. TRM further threatens the resiliency of our town and will be devastating to our trees and to residents.

Diane Hoffman
Convener
Hamden Alliance for Trees
190 Wilmot Road
Hamden CT 06514
203 387 1695
hoffmandiane30@gmail.com

October 23, 2019

Governor Ned Lamont
State Capitol
210 Capitol Avenue
Hartford, CT 06106

Subject: Undergrounding the Electrical Distribution System in Connecticut

Dear Governor Lamont:

Frequent extreme weather events in Connecticut during the past decade have revealed the vulnerability of our electrical distribution (and telecommunication wiring). This system, which is almost universally overhead on poles and wires, is now regularly subject to widespread damage and disruption. The “Halloween” storm of 2011 left over 800,000 customers without power, some for a couple of weeks. The tornados of 2018 left the entire town of Brookfield without power (Eversource had to replace over 2,000 poles and more than 300 miles of wire) and some entire neighborhoods of Hamden (UI territory) were dark for weeks. When outages occur, people die, business, education, and all kinds of services suffer. Streets are impassable because of the tangle of wires and trees that cannot be easily and quickly cleaned up.

In addition to the reliability issue, the ugly tangle of wires, transformers, and switchgear that shrouds almost every street and highway statewide, limits the possibilities for street trees that are more than ever needed for climate mitigation and making streets walkable. In urban environments, street trees contribute to reducing air conditioning loads on adjacent structures.

The utility companies determined that the answer to the reliability problem was the “Enhanced Vegetation Management” legislation, which enables them to remove the tree threat to their wires at our expense. The utilities have been controlling this conversation (and the state legislature) for the past 100+ years, at the expense of reliability, and destroying the aesthetics of our public space. In many other developed countries in the western world (Europe especially), it can be difficult to find any streets with overhead utilities.

This problem was recognized and addressed 100 years ago by the Olmstead firm's 1910 plan of civic improvement for New Haven, and the city engineer F.L. Ford in Hartford. It produced very limited results, not even all of New Haven's historic nine squares downtown are free of overhead wires. Why? The utilities' primary weapon in their effort to kill public discussion of undergrounding is cost. But it is also costly to constantly replace overhead equipment and massacre our trees, which is not a permanent reliability solution. Limbs grow back, and removing trees makes adjacent trees more vulnerable to wind damage.

Other states and places are finding ways to underground utilities. California has been doing it since 1967, with its CPUC Rule 20, which has enabled undergrounding work statewide. Financing can be structured for minimal impact, like Connecticut did with the Enhanced Vegetation Management legislation. The work would go on for 50 – 100+ years, but if it was started 100 years ago, we would be in much better shape today. It will never happen if we don't find a way to start now. Many surveys have been done that indicate the public support for undergrounding exists, even if it costs electric customers a little bit more each month. If Connecticut contractors and suppliers are utilized, the money spent on undergrounding stays in and enhances the local economy.

Connecticut needs leadership from the governor's office, and the legislature, to initiate an ongoing effort to underground its utilities. Our streets are being dug up constantly for gas, sewer, storm drains, and water supply infrastructure. We should incorporate burying the overhead mess into other infrastructure work to help moderate the cost. The utilities have not acted in the long-term public interest on this issue. The time for letting them control our public space must come to an end. They claim to have hundreds of miles of lines undergrounded, but most of those miles still have overhead poles and wires, because it's not the local distribution that is underground, but often just some of the higher voltage transmission and primary distribution lines.

Please help Connecticut to grow up and look like a permanent settlement, not a place that just got electricity last year! We need a "Governor's Task Force on Undergrounding" that is immune to sabotage by the utilities, who need to remember that they are in our public space, and will have to comply with the public's requirements. PURA's regulatory framework will have to be modified to enable this, since getting this done will require precisely defined roles for all stakeholders and players: The Legislature, PURA, Regional Councils of Government, local governments, town engineers, planners, and all the utilities that have their services on the poles that will be removed. The squirrels that previously used the wires to get around on, will then be able to get around on the street trees that can be planted without restriction. Our public space will then look like that of a permanent, mature settlement, instead of a frontier town.

We would appreciate a reply to this letter.

Sincerely,

Diane Hoffman
Henry Dynia
Hamden Alliance for Trees

From: [Ralph Jones](#)
To: [DEEP ClimateChange](#)
Subject: Testimony for Governor's Council on Climate Change 11 Dec 2019
Date: Tuesday, December 10, 2019 1:12:34 PM
Attachments: [image.png](#)

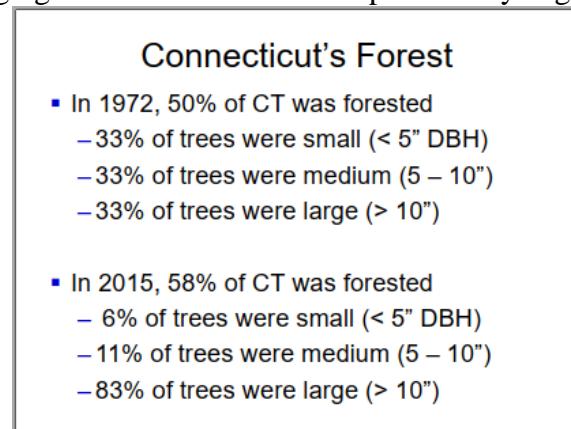
Members of the Governor's Council on Climate Change:

Thank you for taking the time to consider my concerns. You are engaged in work that is essential for the well being of all life as we know it.

As I review the materials on Connecticut's Department of Energy and Environmental Protection website, I see very little about protection and enhancing our forests and wild lands. I am particularly concerned about our urban forests.

Dr. Scott C. Williams, of the Connecticut Agricultural Experiment Station, spoke about the "Links Between Forest and Public Health" at Plant Science Day this past August 7th. His slides are [here](#).

His analysis of the changing health of CT's forests is particularly cogent. Here is a key slide:



In 1972 our forest area was smaller, but it was significantly healthier. A healthy forest must have small and medium trees growing up to replace mature trees as they die off. Williams identified the key problem as an overpopulation of deer preferring to eat young trees.

Williams further identified invasive plants out-competing natives as weakening our forests. All this provides support for ticks and tick borne diseases. He demonstrated the relationship between healthy forests, including urban forests, and healthy people and animals.

Forests -- trees -- have a major role to play in maintaining a healthy environment. As Connecticut works toward its important goals of reducing greenhouse gases, forests and trees play an essential role. This means we must:

1. Protect what we have. This means enforcing practices, rules and laws that protect trees from needless pruning and removal.
2. Where appropriate, care for diseased trees, removing them only when necessary.
3. Plant trees that are native to our State and appropriate to their location. Once planted we must protect them so they can mature. When trees are removed, they must be replaced.
4. Restore the ecological balance. Predators are a necessary part of a healthy natural environment. Removal of invasive plants is also necessary. The Merritt Parkway is

inadequate as deer control!

5. Protect and care for our street trees, especially in urban settings. This includes regulating utility pruning practices and standards so that the environmental consequences are a priority.
6. Educate our citizens about the importance of trees and wild spaces for both immediate and long term well-being. Recent storms and power outages have left some people afraid of trees. People need to hear about the many values of trees and how to access information about appropriate care of them.

I've copied below the CT Forest and Park Association's statement on healthy forests, taken from the Winter 2019 issue of *Connecticut Woodlands*.

Forests -- wild, suburban, and urban -- are major factors in control of climate. They need to be a part of Connecticut's climate efforts. And they contribute so much to making Connecticut a beautiful place to live.

Thank you for your important work.

Sincerely,
Ralph Jones
73 Mulberry Hill St
Hamden CT

From the Statehouse

By Eric Hammerling

CFPA's Policy on Climate Change

Keeping forests healthy and abundant is one of the best ways we can respond to the climate crisis.

What does CFPA do to keep forests healthy and abundant?

For nearly 125 years, CFPA has been working with landowners, policy-makers, and concerned citizens to keep forests healthy. Initially, our priorities were re-growing forests and protecting them from wildfire. Since that time, our goal has been ensuring forests are well-tended and good laws are bolstered by a partnership of forestry professionals, municipal tree wardens, and an educated public. Today, CFPA continues this long tradition of taking action for forests in several ways, which helps to combat climate change:

- CFPA advocates for laws such as Public Act 490, which keeps property taxes low for forest landowners; and the Forest Practices Act, which ensures the highest standards for Connecticut's forestry professionals.
- CFPA conserves over 2,000 acres of forested properties to benefit wildlife and forest health, and to provide training opportunities for other forest landowners.
- CFPA educates the public about the values that forests provide for public health, wildlife, clean air, and water.
- CFPA builds and maintains trails that enhance recreational access and deepen the public's appreciation for Connecticut's forests.

How do forests relate to climate change?

Greenhouse gases (GHG) like carbon dioxide and methane are being emitted into the atmosphere at an unsustainable rate. Globally, about one-third of GHG are being absorbed, or sequestered, by natural solutions such as plants, soils, and the ocean. Amongst land-based sources, forests sequester about 90 percent of atmospheric carbon.

How is Connecticut utilizing forests to slow down climate change?

About 55 percent of Connecticut's landscape is forested. For the past five years, our forests have grown slightly faster than they have been lost, and overall there have been net

gains in forest biomass. This is encouraging, especially in light of significant forest losses and fragmentation over the past 50 years. However, more forests should be protected by acquisition, easement, or long-term forest management commitments by private landowners.

Today, many state and private forests are managed as "working forests." Working forests utilize forest management plans to accomplish multiple ecosystem and economic objectives, such as generating revenues and wood sustainably while also enhancing wildlife habitats, protecting water quality, and providing recreational opportunities. Some of the outputs from working forests, such as flooring or furniture, represent another way that carbon can be sequestered.

What can Connecticut do differently moving forward?

Although keeping forests healthy and abundant is one of the best ways to mitigate climate change, the government has focused on reducing emissions from the energy, housing, and transportation sectors. Of course, reducing emissions from these sectors is critical, but it's equally important to have ambitious goals and programs that encourage carbon sequestration by investing in natural ecosystems, like forests and wetlands.

The Governor's Council on Climate Change recently formed a working group on "natural and working lands" to help identify the resources necessary to protect and manage forests, farmlands, open space, and wetlands.

In addition, existing plans such as Connecticut's Green Plan, Forest Action Plan, Wildlife Action Plan, Statewide Comprehensive Outdoor Recreation Plan, and management plans for state forests include several recommendations that, if implemented, can move Connecticut forward with a more coordinated and focused approach to climate change mitigation.

Connecticut should also provide incentives and outreach that encourages reforestation in urban and suburban areas, forest management for increased sequestration and resilience, funding for additional protection of forestland, and recognition of the benefits from forestlands that don't qualify for enrollment in P.A. 490 (forests under 25 acres), but represent a large portion of our forested land.

Thanks to your support, CFPA will be participating in these efforts and will continue to be a leader in promoting the importance and value of forests in combatting climate change.

Eric Hammerling has served as the Executive Director of the Connecticut Forest & Park Association since 2008.

From: [Diane Keefe](#)
To: [DEEP ClimateChange](#)
Cc: [Ann Pratt](#)
Subject: Public comment regarding climate change policy
Date: Friday, December 13, 2019 4:33:50 PM

- 1) Net metering needs to stay in place for at least 5 years to incentify more adoption by residences and businesses. One year extention create too much uncertainty for solar industry to invest in market penetration in CT.
- 2) CCA needs to be authorized statewide. We don't need to pilot it when NJ, MA and NY are already moving forward.
- 3) Additional Green Bank funding needs to be authorized and the \$54 million previously removed from energy efficiency funds needs to be restored.
- 4) CT cities with over 70, 000 population need to implement urban reforestation programs through existing community gardening and summer jobs programs to plant native fast growing trees and shrubs that will restore soil health, combat erosion, and provide pollinator pathways this summer.
- 5) statewide regulations, loan programs and standards need to be established for residential and commercial small scale wind turbines and geothermal systems so consumers know it is doable this year.
- 6) the availability of low cost financing for reroofing to accommodate solar installations needs to be well publicized on bill boards, radio and social media targetted at home owners.
- 7) a special statewide fund of 1% interest should be made available to borrowers for schools, non profit facilities and municipal facilities secured by utility payment streams from leases of solar, wind or geothermal equipment.

Thank you

Diane Keefe
249 Chestnut Hill Rd
Norwalk, CT 06851
Dianekeefe@gmail.com
917 312 4601

From: [Jennine Lupo](#)
To: [DEEP ClimateChange](#)
Cc: [Ann Pratt](#); [Martha Klein](#)
Subject: Testimony for Governors Council on Climate Change
Date: Saturday, December 07, 2019 9:46:21 AM

Hello,

As your group discusses the objectives to be set forth in the upcoming Governor's Council on Climate Change, the following initiatives should be included to help curb greenhouses gases (GHG):

1. All new school, municipal and state buildings must be / have
 - constructed with some percentage of repurposed material,
 - solar arrays on their roofs & over carports where possible,
 - LED lighting throughout
 - passive geothermal heat exchangers as part of their HVAC system.
2. Pension funds of state workers and teachers will be 100% divested of all fossil fuel stocks or funds. To do this we must:
 - Immediately freeze any new investment in fossil fuel companies;
 - Divest from direct ownership and any commingled funds that include fossil fuel public equities and corporate bonds within 2 years
 - End fossil fuels sponsorship across the board.
3. Halt all new methane infrastructure plans. Connecticut won't meet its GHG reduction target goals given the rapid pace of building new methane infrastructure - and this is baffling considering the complete lack of need for natural gas / methane. No new gas power plants, pipelines, fuel cells, nor various infrastructure which precludes Connecticut from achieving GHG reduction target goals.
4. Continue to invest in mass transportation - high speed rail we need more affordable lines between Hartford and Boston and we need one train station in the NW corner. This transit should also be subsidized by big business that employees 100+ people in order to provide a sliding scale for workers making 80% of the state's median income.
5. Devise more effective connections between Connecticut farms, local markets and workforces. This will ensure Connecticut farmers have a truly viable economy to continue to produce fresh food and will reduce GHG required for shipment of food from out of state / country.

Thank you for providing a space for written testimony to be submitted. Please work hard to achieve whatever objectives are agreed upon.

Sincerely,

Jennine & Roberto Lupo
109 East Chestnut Hill Road
Litchfield CT 06759

Jennine Lupo
jenninelupo@gmail.com
203-768-6460 (cell)
860-567-0655 (home)

From: [Craig Machado](#)
To: [DEEP ClimateChange](#)
Subject: Importance of our tree canopy
Date: Saturday, December 07, 2019 11:16:41 AM

As the state loses more and more trees from disease, storms and overcutting by utilities, we must do more to replant them. Trees are part of the solution to mitigate global warming. They sequester carbon dioxide, provide oxygen and shade, and protect soil. Help towns and cities across the state to replant trees and improve our environment.

Thanks
Craig Machado
19 Charlton Hill Road
Hamden CT 06518

From: [Thomas Meiklejohn](#)
To: [DEEP ClimateChange](#)
Subject: Climate action
Date: Saturday, December 14, 2019 1:55:17 PM

You and the governor can count on public support for any strong climate action you take.

Thomas W. Meiklejohn
Livingston, Adler, Pulda, Meiklejohn & Kelly
557 Prospect Ave.
Hartford, CT. 06105
LAPM.org
(860) 570-4639

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From: [Christine Melchinger](#)
To: [DEEP ClimateChange](#)
Subject: Hamden trees
Date: Wednesday, December 11, 2019 8:01:16 AM

Dear Commissioner Dykes,

It is winter, time for trees to rest and to recover before they once again shade us, enhance the air we breathe and provide the beauty of our streets and gardens. We have time to consider in winter as we pass beneath them all their gifts that will come with their awakening in spring.

Hamden, however, has lost a multitude of its trees through disease, storms, fallible initial planting and the action of United Illuminating Company. UI has created excessive tree wreckage, especially recently. You of DEEP can provide protection from UI's aggressive acts against these innocent defenders of our wellbeing. Just when the companies providing sewage, gas, and water are united invisibly underground, electricity remains above ground. Why is this so?

We call upon you at DEEP to aid us in preventing further destruction of our trees created by UI's newest strategy called TRM, "Targeted Risk Management". It disregards the established law of CT Section 16-23 for tree management. TRM is a policy equivalent to that of an occupying army living among us, steadily draining our spirit of an elemental life force - our trees. Trees are as important to the very structure of our town as are our houses and other significant buildings. UI's present policy must not be allowed to continue. While insisting on carrying our energy on absurdly high poles in what will be increasingly erratic weather patterns its wires conflict with tree branches and so the trees must go. Why is that? Why has UI's influence been allowed to prevail over our living, thriving trees which must be felled or hacked to make way for wires?. We pay electric fees. We should not have to pay for power with our trees. Hamden's people count on your protection against bullying by a company which has had 100 years to change its methods but has not begun. It makes its poles higher rather than burying the lines, the obvious solution to this problem.

Hamden's people, busy with daily life, have taken our trees for granted. Now they are largely gone from our roads and public places. Without their beauty arching over our streets enhancing and refreshing our homes, cooling the walks for our children running barefoot, we belatedly realize something is missing. Only the elegant trees planted long ago on private property provide our urban canopy. We have left our children in a terrible mess and we must reverse this direction. Global warming is well upon us . We are pressed for time. We must think clearly and do what needs to be done. We do not have the major defense of large, lovely shade trees giving us their magnificent gifts the enlightened parts of the world recognize as a necessity. It takes nearly a century to grow a fine shade tree. We should have begun 20 years ago to replace those lost after the scientifically predicted changing weather pattern began to produce the storms which took them.

Please help us, won't you, with your effort to benefit our whole town, especially the children? Why not become a smart town? It takes imagination and guts. Do we possess that? I think we do. You are of the fabric of the town created to balance profit while benefiting the taxpayer. We ask that you use all your advantage to address UI's detrimental TRM program. Help us to replace our missing trees while preserving those that are thriving. There isn't a lot of time for trees to get to work. A grand shade tree takes about a century to grow. UI destroys it in a few hours. With global warming's steady advance we are now beyond local politics and need intelligent effort of our best forces for the common good. Our youth will not sit quietly nor will our elders who have enjoyed a lifetime of the benefits of trees as they remember greener, more beautiful towns in which they have lived. Promote burying the lines to allow the trees freedom to grow.

Please examine UI's present direction concerning our trees. Please join HAT and all individuals who are depending upon you to do the work you are empowered to do to enable our town to replace trees lost decades ago. Only trees can provide their unique, life-giving benefits. First we must get them into the ground, ready for the sun and rain. First they must be planted.

Thank you for your attention.

Sincerely,

Christine Melchinger
Hamden Resident
HAT member

I applaud Gov. Lamont's Executive Order #3 calling for a carbon-neutral grid in the state by 2040. It's a step in the right direction, but it's not enough.

However, at the rate the state is approving fracked gas power plants, we will not reach even that modest goal. In the past few years, such plants have come on line in Oxford and Bridgeport, and one has been approved for construction in Killingly, tentatively approved in Bristol (without even a public hearing until members of the public requested one), and perhaps only temporarily halted by student activists at UConn.

Fracked gas is more than 90 percent methane, and methane leaks at every stage in the process of mining, distribution and burning. It is 100 times worse for the climate than CO₂ over a ten-year period, and that's the time the IPCC says we have left to greatly reduce our climate footprint or face devastating climate feedback loops. More at the links below:

<https://www.sightline.org/2019/02/12/calling-natural-gas-a-bridge-fuel-is-alarmingly-deceptive/>

<https://eandt.theiet.org/content/articles/2019/08/fracking-boom-dramatically-boosts-methane-emissions/>

Especially since the state is moving forward with offshore wind generation, we do not need – and cannot have – more dirty energy. We need to close the existing gas plants as quickly as possible, not build new ones.

My other big concern is the wholesale destruction of our tree canopy in CT. This comes mainly from three sources: "natural" disasters, such as the super-storms and tornadoes that have hit the state in the past 8 years, which themselves are made stronger by climate change; from tree removal – not trimming – by the state's two electric utilities of our street trees; and from the pre-emptive wholesale removal of trees along our state and interstate highways by the Department of Transportation, which says it's to prevent trees falling on the roadway, but which could be accomplished by removing just the dying, dead and diseased trees and leaving the healthy ones alone. I'm aware that in the wake of the two devastating storms in 2011, the utilities were tasked with removing more trees, but I don't believe it's being done in a sustainable manner.

Trees are important for dozens of reasons, but a primary one is that they mitigate the damage from climate change. They absorb CO₂ and release oxygen; they provide shade to give relief from extreme heat, and serve as a brake on frigid winter winds. They also contribute to our mental health, something that is going to be ever more challenged the deeper we go into the climate crisis. I want the state to stop the wholesale massacre of trees and embark on an ambitious tree-planting program, which, according to the book *Drawdown*, is one of the top ways to restore a safe climate.

From: [Alejandro Vasquez](#)
To: [DEEP ClimateChange](#)
Subject: Climate testimony
Date: Tuesday, December 10, 2019 9:45:14 AM

My name is Alejandro Vasquez and I have been by striking with Friday's for Future for 28 weeks. I often get asked why i strike and is it worth missing class. my answer is because i don't have the luxury to not be worried at the state of world as i grow up. i live in a world where it's not strange to hear a story about 2 500 year floods happening in the span 10 years, indigenous land being taken to be used for a new pipeline, and worse of all greed taking precedence over the environment. The US needs to take steps to not only sustainable energy but sustainable farming that doesn't pack hundreds of chicken in a dark coup or leaves soil practically dead. Its important to take a stand and take action by striking on fridays to show our local and national government that we won't watch our future be taken by greed and inaction. My climate story occurred long before I was born, my mom grew up in Colombia where her parents owned a small farm that grew coffee and mangos, after drilling in the nearby mountains and the building of roads to transport the resources stolen from the land a history of landslides began. An area that was once thriving became impoverished. After realizing that she had no successful future in her own country, my mother moved to the United States. Those who are effected currently by the climate crisis have no time for slow change. They require the support of their government who's purpose is not to maintain status quo but represent the people and their interests and as a member of our global community, I call on every elected official to find ways to transition and solve this climate crisis. Leaders need to understand that this crisis cannot be fixed with individual action alone but it requires government intervention to begin the transition to a sustainable and renewable energy grid. People have to stop identifying the climate crisis as a liberal left-end issue . If we are going to stop the climate crisis, we must stand alongside each other despite our differences in political beliefs. Party politics and science are two very different things.